REMARKS:

This paper is herewith filed in response to the Examiner's Office Action mailed on September 20, 2010 for the above-captioned U.S. Patent Application. This office action is a rejection of claims 31-32, 35-36, 38, 40-41, 49-50, 52, 55-56, 58-60, 62-65, 67-68, 70-71, 73-74, 77, 82-84, 98-102, 105, and 128 of the application.

More specifically, the Examiner has rejected claims 31, 49, 55, 82, and 98 under 35 USC 112, second paragraph, as being incomplete for omitting essential steps; rejected claims 31-32, 35-36, 38, 40-41, 49-50, 55-56, 58-60, 62-65, 67-68, 70-71, 73-74, 76-77, 82-84, 98-102, 105, and 128 under 35 USC 103(a) as obvious over the combination of Ray (US 6,424,638) and further in view of either Keski-Heikkilaet (US 6,882,844) or Vikberg (US 6,925,074), and Ritter (US 6,289,221). The Applicant respectfully traverses the rejection.

Further, the Applicant notes that the Examiner has indicated that claims 52, 61, and 103 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Applicant thanks the Examiner for this indication of allowance.

Claims 31, 38, 49, 55, 60-63, 82, and 98 have been amended. Support for the amendments can be found at least in paragraphs [0034], [0036], and [0038] of the Application as filed. No new matter is added.

Rejection of independent claims 31, 49, 55, 82, and 98 under 35 USC 112, second paragraph

Claims 31, 49, 55, 82, and 98 have been amended to overcome the rejection. The Applicant submits that the amendments clarify the claims so as to address the Examiner's assertion of a gap between the steps. The rejection of claims 31, 49, 55, 82, and 98 under 35 USC 112, second paragraph, is seen to be overcome and the rejection should be removed.

Rejection of independent claims 31, 49, 55, 82, and 98 under 35 USC 103(a)

Although the Applicant does not agree with the rejections, the Applicant submits that in order to facilitate the prosecution of this patent application towards allowance each of the independent claims 31, 49, 55, 82, and 98 have been amended in a somewhat similar fashion. For example, claim 31 now recites:

> "An apparatus, comprising: at least one processor; and at least one memory including computer program code, where the at least one memory and the computer program code are configured, with the at least one processor, to cause the apparatus to at least: identify an access point of a first telecommunication network as being a neighbor cell to a second telecommunication network by transmitting identity information for the access point of the first telecommunication network to a mobile station, the transmitted identity information using a cell identity information structure of the second telecommunication network, wherein the first telecommunication network is a different radio technology than the second telecommunication network and wherein the transmitted identity information comprises a location area code associated with the second telecommunication network; and dependent upon at least part of the transmitted identity information matching information given to the mobile station by a cell serving the mobile station, receive, from the mobile station, monitoring and measurement information associated with different radio technologies of at least the first telecommunication network and the second telecommunication network."

In accordance with the exemplary embodiments of the invention identity information is transmitted by a device, such as an access point, in a first telecommunication network, for example a wireless local area network (WLAN), to at least one other device, such as a mobile station. The transmitted identity information using a cell identity information structure of a second telecommunication network, for example a global system for mobile communication (GSM) network. The transmitted identity information including a location area code associated with the second telecommunication network, wherein the first telecommunication network is a different radio technology than the second telecommunication network. In accordance with the embodiments, dependent upon an indication at the other device, such a the mobile station, that at least part of the transmitted identity information is matching information given to the mobile

station by a cell serving the mobile station, the mobile station may provide continuously information regarding the different radio technologies of both the first and second telecommunication network. In accordance with the embodiments the cell serving the mobile station can be in the second telecommunication network. For example, the mobile station may provide information regarding a WLAN and neighbor GSM cells. Support for the amendments can be found at least in paragraphs [0034], [0036], and [0038] of the Application as filed.

Ray

In the rejection of claim 31 the Examiner asserts that Ray discloses where claim 31 relates to receiving, from a mobile station, monitoring and measurement information associated with different radio technologies of at least the first telecommunication network and the second telecommunication network (see page 4 of the Office Action). The Applicant disagrees.

The Examiner states:

> "With reference now to FIG. 2A of the drawings, which will be described in connection with the steps listed in FIG. 2B of the drawings, when an MS 20 is involved in a call connection with a called party (shown here as a wireline subscriber within the Public Switched Telephone Network), the MS 20 may roam from one cell 22a into another cell 22b. The process of changing cells during a call is referred to as a handover. **In order to choose the best target cell 22b to handover** the call to **the MS 20 and BTSs 24a and 24b must collect measurements,** which are processed in the serving BSC 23a (step 200) . In this example, the two cells 22a and 22b are controlled by different MSCs 14a and 14b. (C3, L37—47)," and
>
> "Furthermore, note that Ray teaches the entire measuring/handoff process in Columns 4 thru 7 and shows in detail how the mobile roams, measures/reports and a decision is made to handoff from one network to a second/different network: As an example, in FIG. 3, the handover is being performed from a GSM system 350 to a D-AMPS system 360. However, **it should be understood that the below-described solution will work between any two types of wireless systems** 350 and 360. However, the specific signaling messages used for handover procedures may vary between systems. C4, L27—39," (page 4 of the Office Action).

First, the Applicant reasserts that in Ray the MS 20 is collecting measurement information only from the GSM base transceiver stations on which it is currently camped, (see col. 3, lines 44-47). Further, in "the entire measuring/handoff process in Columns 4 thru 7 [of Ray]" as asserted in the rejection, there is not disclosed an operation of receiving from the MS 20 of Ray monitoring and measurement information associated with different radio technologies of at least a first telecommunication network and a second telecommunication network.

Moreover, Ray does not disclose or suggest where amended claim 31 relates to dependent upon at least part of transmitted identity information matching information given to a mobile station by a cell serving the mobile station, receiving from the mobile station monitoring and measurement information associated with different radio technologies of at least a first telecommunication network and a second telecommunication network.

Ray discloses:

> "the Internet Gatekeeper 320 can compile a list 355 of identities 356 of these potential target base stations 25b (step 435), along with location information 358 for each potential target base station 25b and an indication of the MSC 14b associated with each potential base station 25b. [...] Thereafter, the Internet Gatekeeper 320 can send this list 355 of potential target base station identities 356 and the MSCs 359 that each are associated with to the GSM MSC 14a via the Internet Gateway 310a associated with the GSM MSC 14a (step 440)," (col. 5, lines 57-67); and
>
> "Upon receiving this list 355, the GSM MSC 14a sends a request to the MS 20a via the serving base station 25a, asking the MS 20a to change its frequency and transmit a measurement report from the neighboring cell(s) 22b of the new wireless system(s) 360 back to the GSM base station 25a (step 445)," (col. 6, lines 1-6).

In Ray upon receiving the list 355 of the potential target base station identities the MSC 14a sends a request to the MS 20a via the serving base station asking the MS 20a to change its frequency and transmit a measurement report from neighboring cells. Ray does not disclose the MS 20a is transmitting measurement reports dependent upon identity information transmitted to

the MS 20a matching information given to the MS 20a by a cell serving the MS 20a. The Applicant submits that the MS 20a of Ray makes no such determination regarding matching information.

In addition, the Applicant submits that none of the references cited overcome at least the above stated shortfalls of Ray.

Vikberg

According to Vikberg, it is assumed that the mobile terminal Mobile Terminal 1 (MT 1) has previously identified the strongest public mobile radio signal from a neighboring cell. Further, according to Vikberg, the Bluetooth radio resource layer 360 periodically monitors the Bluetooth signal and also sends a message which is conveyed to the home base station controller (HBSC 105). Then the HBSC 105 evaluates the reported measurements to determine if a handover is required, (col. 12, lines 1-17). However, the Applicant submits that Vikberg fails to disclose an operation where the MT 1 is sending monitoring and measurement information associated with different radio technologies, no less that the MT 1 is reporting measurements dependent upon at least part of transmitted identity information matching information given to the MT 1 by a second telecommunication network.

Therefore, the Applicant submits that Vikberg does not overcome at least the shortfalls of Ray as stated above.

Ritter

In the Office Action the Examiner asserts that Ritter teaches a mobile system whereby coverage areas are supported by multiple wireless technologies (see page 5 of the Office Action). However, similar to Ray and Vikberg, Ritter does not teach an operation dependent upon at least part of transmitted identity information matching information given to a mobile station by cell serving the mobile station, receiving, from the mobile station, measurement information. Further, the

Applicant submits that Ritter does not teach receiving monitoring and measurement information associated with different radio technologies of at least a first telecommunication network and a second telecommunication network. In addition, the Applicant submits that, similar to Ritter, Keski-Heikkilaet does not disclose or suggest at least these features of claim 31.

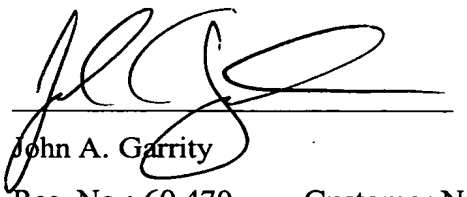
Thus, the Applicant submits that, for at least these reasons, even if the references were somehow combined, which is not agreed to as proper, the proposed combination would still not disclose or suggest claim 31. Thus, the rejection of claim 31 should be removed and the claim allowed.

In addition, the Applicant submits that, for similar reasons, the foregoing amendments to the independent claims 49, 55, 82, and 98 also place these claims in condition for allowance in view of the references cited. Therefore the Examiner is requested to remove the rejections and allow these claims.

Further, the Applicant submits that the dependent claims of the application are similarly allowable for at least the reason of their dependency to the independent claims.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record. Should any unresolved issue remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted:



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